

March 15, 2013

Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: *Ex Parte* Presentation, Modernizing the FCC Form 477 Data Program,
WC Docket No. 11-10**

Dear Ms. Dortch:

On March 13, 2013, representatives of several wireless providers and wireless associations met with staff of the Federal Communications Commission regarding issues relevant to the above-listed proceeding. Specifically, Colleen Thompson and Jay Bennett of AT&T, Larry Lueck of Cellcom (via telephone), Jim Ucci of SouthernLINC (via telephone), Marybeth Banks of Sprint Nextel, Indra Chalk of T-Mobile USA, Bill Tortoriello of US Cellular (via telephone), Ian Dillner of Verizon, Sean Spivey of the Competitive Carriers Association, Brian Josef of CTIA—The Wireless Association®, Jill Canfield and Rick Schadelbauer (via telephone) of NTCA, and Carri Bennet of the Rural Telecommunications Group (collectively, “Wireless Provider Representatives”), met with Jim Schlichting, Susan Singer, Mitali Shah, and Michael Jansen of the Wireless Telecommunications Bureau, and Carol Simpson, Ken Lynch, Ellen Burton, Steve Rosenberg (via telephone) and Rodger Woock of the Wireline Competition Bureau, (collectively, “FCC Staff”). The parties addressed potential changes to the current FCC Form 477 broadband data collection and the Commission’s goal of updating and improving the data collected from wireless providers, while minimizing burdens on those entities filing Form 477.

During the discussion, FCC Staff and Wireless Provider Representatives discussed the potential expansion of the current Form 477 data collection to include deployment data by shape files in the formats currently provided in the NTIA Broadband Mapping Program. FCC Staff explained their desire to obtain shape file maps from providers, submitted by air interface technology, frequency band, and advertised speeds. FCC Staff also expressed their interest in obtaining more information regarding providers’ ability to report adoption information, including (1) prepaid and postpaid subscribers, (2) classification of device type (*e.g.*, smartphone, tablet, etc.), (3) subscribers that bundle wireline and wireless services where providers offer both, and (4) machine-to-machine adoption data, including e-readers and other devices, in a revised Form 477. Finally, FCC Staff discussed the potential use of an application that providers would use to provide data to the Commission. Wireless Provider Representatives described challenges associated with these proposals, including whether providers have such information available, and explained the substantial aggregate burden that these additional data collection requirements

would impose. Wireless Provider Representatives expressed interest in the Commission providing filing entities with more detailed notice and an opportunity to comment on the adoption information under consideration before adoption of any order.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office.

Sincerely,

/s/ Brian M. Josef

Brian M. Josef

cc: Jim Schlichting
Susan Singer
Mitali Shah
Michael Jansen
Carol Simpson
Ken Lynch
Ellen Burton
Steve Rosenberg
Rodger Woock